

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

Ramon A. Suarez
Norma I. Suarez

Debtor(s)

Case No.: 16-26032 / CMG

Hearing Date: July 19, 2017

Chapter: 13

Judge: Christine M. Gravelle

MOTION FOR ENTRY OF ORDER DECLARING THE AUTOMATIC STAY TERMINATED

TO THE HONORABLE COURT:

COMES NOW secured creditor Scotiabank Puerto Rico (“Scotiabank”), through its undersigned counsel, and respectfully states and prays as follows:

1. On August 19, 2016, the Debtor filed the instant Chapter 13 bankruptcy petition. See Docket No. 1.
2. Scotiabank is a secured creditor in the instant case with a lien over the property (the “*Property*”) described in *Schedule A* as “Apartment 403 Puerta Del Mar Condominium Aguadilla, PR 00603 Aguadilla County”. *Schedule A*, Docket No. 8. Also see *Schedule D*, pp. 3, 17.
3. On September 1, 2016, the Debtor filed a *Chapter 13 Plan* (the “*Plan*”, Docket No. 9) that was confirmed on January 31, 2017. See the *Order Confirming Chapter 13 Plan*, Docket No. 18.
4. The *Plan* states that “[u]pon confirmation, the stay is terminated as to surrendered collateral”. *Plan*, Docket No. 9, p. 3.
5. Based on the terms of the *Plan*, and because the Plan has already been confirmed, the *Property* has already been surrendered in favor of Scotiabank. See *Plan*, Docket No. 9, p. 3.

Scotiabank hereby submits the foregoing certification of the facts in support of this Motion in compliance with D.N.J. LBR 9013-1.

Dated: June 6, 2017
Westfield, NJ

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